



R04-18-A-069

November 13, 2017

Ms. Barbara Alfano  
Brownfield Administrator  
Environmental Protection Agency, Region IV  
Atlanta Federal Center  
61 Forsyth Street, SW 10<sup>th</sup> Floor  
Atlanta, Georgia 30303-8960

RE: Catawba Regional Council of Governments, South Carolina  
FY2018 Brownfields Assessment Coalition Grant Application for Chester, Lancaster,  
Union, and York Counties, South Carolina

Dear Ms. Alfano:

The Catawba Regional Council of Governments is an association of South Carolina local governments in Chester, Lancaster, Union and York counties. Created in 1970, we serve as a forum for intergovernmental cooperation and as a central staffing resource for land use and transportation planning, community and economic development, workforce investment, GIS mapping, information systems, and project management. Thus, we see the needs in our communities, some of which have been severely negatively impacted by the decline of the textile industry in South Carolina. While some of our region has seen recent economic and population growth as a result of the expansion of the Charlotte urban area into South Carolina, our many small communities outside of this higher-growth area struggle with vacant mill properties while simultaneously facing revenue challenges from declining populations and the loss of employment opportunities. We hope to help these communities assess the environmental conditions of the many mill properties that we have across the region with funding from this grant.

- a. APPLICANT IDENTIFICATION: Catawba Regional Council of Governments  
215 Hampton Street  
Suite 200  
Rock Hill, South Carolina 29730
- b. FUNDING REQUESTED:
  - i. Grant Type: Assessment
  - ii. Assessment Grant Type: Coalition
  - iii. Federal Funds Requested: \$600,000
  - iv. Contamination: Hazardous Substances \$500,000/Petroleum \$100,000
- c. LOCATION: Chester, Lancaster, Union, and York Counties, South Carolina
- d. PROPERTY INFORMATION: N/A

e. CONTACTS:

- |   |   |
|---|---|
| i. Project Director<br>Robert Moody<br>Senior Planner<br>Catawba RCOG<br>215 Hampton Street, Ste 200<br>Rock Hill, SC 29730<br>Ph. (803) 327-9041<br>Fx. (803) 327-1912<br><a href="mailto:rmoody@catawbacog.org">rmoody@catawbacog.org</a> | ii. Chief Executive<br>Mr. J. Randall Imler<br>Executive Director<br>Catawba RCOG<br>215 Hampton Street, Ste 200<br>Rock Hill, SC 29730<br>Ph. (803) 327-9041<br>Fx. (803) 327-1912<br><a href="mailto:rimler@catawbacog.org">rimler@catawbacog.org</a> |
|---|---|

f. POPULATION:

- i. Chester County - 32,708; Lancaster County - 79,515; Union County - 28,329; York County - 235,285
- ii. The Catawba Regional Council of Governments is a Regional Council of Governments.
- iii. None of the 4 counties have had a 20% or greater poverty rate since 1990.

g. REGIONAL PRIORITIES FORM/ OTHER FACTORS CHECKLIST: Attached

- h. LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY: Ms. Daphne Neel, Bureau Chief for the South Carolina Department of Health and Environmental Control's (SCDHEC) Bureau of Land and Waste Management, issued a letter acknowledging this grant proposal and the Department's support of the planned coalition assessment activities for the Catawba Regional Council of Governments. The SCDHEC letter is included as an attachment.

We are committed to the success of this program and the redevelopment of brownfield sites within our region. Thank you for your time and consideration. If you should have any questions, please do not hesitate to contact me at (803) 327-9041.

Truly yours,



J. Randall Imler  
Executive Director

## Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: The Catawba Regional Council of Governments, South Carolina

### Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): Assistance to Communities that Have Limited In-House Capacity to Manage Brownfields Projects

This coalition application targets struggling former mill towns running along the southern and western areas of our region including Chester, Clover, Jonesville, Union, Lockhart, Chester, Great Falls, Lancaster and Kershaw. These are small local governments in need containing mill properties that are blighting their communities.

Page Number(s): 1 and 2

### Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	X, P.11
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



November 10, 2017

Barbara Alfano  
Region 4 Brownfields Coordinator  
United States Environmental Protection Agency  
Resource Conservation and Restoration Division  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Coalition Assessment Grant  
Catawba Regional Council of Governments, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the Catawba Regional Council of Government's application for a Brownfields Coalition Assessment Grant. The grant will facilitate assessment of numerous former Mill Sites in the COG region within the central upstate of South Carolina.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the COG in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

A handwritten signature in blue ink that reads 'Daphne Neel'.

Daphne Neel, Chief  
Bureau of Land and Waste Management

cc: Liz Basil, Midlands EA Columbia  
Robert Hodges, Brownfields Program

## 1. COMMUNITY NEED

### 1.a. Target Area and Brownfields

#### 1.a.i. Community and Target Area Descriptions

**Catawba Regional Council of Governments (COG)** is an association of South Carolina local governments in Chester, Lancaster, Union and York counties. Created in 1970, the COG serves as a forum for intergovernmental cooperation and as a central staffing resource for land use and transportation planning, community and economic development, brownfields technical assistance, workforce investment, GIS mapping, information systems, and project management. Since 2007, the COG has also served as the fund manager for the South Carolina Department of Health and Environmental Control (DHEC)'s statewide EPA Brownfields Cleanup Revolving Loan Fund. In 2015 the Census Bureau estimated a total population of 382,020 for our four counties. This area contains 22 municipalities and the Catawba Indian Nation, a federally recognized tribe with a reservation in eastern York County. Historically a region of inexpensive labor and ready supply of waterways made it an ideal location for textile mills in the early 1900s. With the coming of the railroads, mill communities multiplied across the region driving economic expansion and job growth – peaking in the 1970s. The mill was often the center of these communities with the company providing many commercial and public services such as utilities, housing, banks, and stores. As the nation's economy shifted away from manufacturing, the mills declined rapidly throughout the 1980s, 1990s, and 2000s and many closed. Most of the region's recent economic and population growth is a result of the expansion of the Charlotte, NC, urban area directly to the north. This growth is centered in northern York and Lancaster counties close to I-77. Still, many of the small communities outside of these higher-growth areas struggle with vacant mill properties, while simultaneously facing revenue challenges from declining populations as workers and their families move to these faster-growing job markets. Catawba COG worked with communities in need across the region to identify former mill properties blighting the prospects of local economies. We found a band of struggling former mill towns running along the southern and western areas of our region, including Chester, Clover, Jonesville, Union, Lockhart, Great Falls, Lancaster and Kershaw. These towns and cities share a common economic and cultural history. During interviews, residents of these communities identified brownfields, particularly the blighted former mill properties, as significant impediments to the well-being and redevelopment of their community. Therefore, the Target Area for this application will be this band of former mill towns, identified by 13 census tracts (see demographic table). The Target Area includes 53,301 residents in 2015 - just under 15% of COG region's total population (2015 ACS US Census). Yet, this area is estimated to contain 80% of the region's brownfield sites according to the Textile Mill Redevelopment Guide prepared for the area.

#### 1.a.ii. Demographic Information and Indicators of Need

While the Catawba COG Region as a whole compares well with State averages for educational attainment, poverty, median home values, income, and similar demographic and economic indicators, a more granular analysis using a Geographic Information System (GIS) reveals a different story. In our region there is a sharp divide between our Target Area of rural, former mill towns now impacted by brownfields and the northeastern portion, which benefits from the neighboring Charlotte Metropolitan Area growth and expansion. Communities in the Target Area have had difficulty retaining workers and their families after the closure of the mills. The struggle continues. From 2010 to 2015 population in the Target Area declined by 1%, while the region outside the Target Area grew by 11% over the same period (2010 - 2015 US Census Data). Many of those that remain are disadvantaged. Per capita income for the Target Area is just over \$12,000 – less than half that of the COG Region and the State. Nearly one in every three families with children in the Target Area have incomes below the poverty level, and over 20% of households receive Food Stamp/SNAP assistance. This population includes a higher level of minority representation (37% vs. 27% for the region) and lower educational attainment – only 11% of

adult residents hold Bachelors or higher degrees vs. 25% for the region. In addition, the Target Area suffers from low property values. The median home value in the Target Area is approximately \$96,000 vs. nearly \$160,000 for the region. These small communities in the Target Area lack the tax revenues needed to deal with the large demolished industrial properties on their own – an unfortunate legacy of their past.

### Demographics for Catawba COG, South Carolina

ACS 2015 5-year Estimate Data, Census.gov (Retrieved September 2017)

Demographic	Target Area*	COG Region	South Carolina	United States
Population	53,301	382,020	4,777,576	316,515,021
Percent Minority (Alone)	36.9%	27.0%	32.8%	26.4%
Percent African-American (Alone)	33.9%	22.3%	27.5%	12.6%
Percent Hispanic (Alone)	2.1%	4.3%	5.3%	17.1%
Percent Children (5 -under)	6.6%	6.2%	6.1%	6.3%
Percent Elderly (65-over)	14.7%	14.5%	15.2%	14.1%
Percent Women of Child Bearing Age	22.7%	24.0%	23.8%	24.1%
High School Graduate or Higher	77.0%	85.8%	85.6%	86.7%
Bachelor Degree or Higher	11.4%	25.1%	25.8%	29.8%
<b>Economic Statistics</b>				
Individuals Below Poverty Level	25.4%	16.3%	17.9%	15.5%
Families with Children Below Poverty	32.1%	19.4%	22.0%	18.0%
Per Capita Income	\$12,226	\$25,339	\$24,604	\$28,930
Households with Food Stamp/SNAP	22.6%	14.1%	15.1%	13.2%
Median Household Income	\$34,763	\$51,309	\$45,483	\$53,889
Unemployment Rate	7.0%	6.1%	9.5%	8.3%
Median Home Value	\$96,452	\$157,018	\$139,900	\$178,600
Percent Vacant Homes	15.9%	10.1%	16.5%	12.3%
Percent Rental Homes	28.3%	24.8%	31.4%	36.1%

\*Comprised of 13 Census Tracts: 102, 105, 107, 201, 203, 210, 304, 308, 309, 616.01, 617.05, 618.01 & 618.02.

#### 1.a.iii. Brownfields and Their Impacts

Catawba COG staff with support from Community Development Block Grant (CDBG) funding held 14 public meetings with members in the Target Area between 2016 and 2017. Over 250 people attended these meetings, and the problems associated with the legacy textile mills and brownfield properties were repeatedly discussed. These meetings and subsequent outreach in preparation for this grant proposal identified the following brownfield sites of concern to residents in the Target Area that are considered top priorities for assessment activities.

- **Eureka Cotton Mill** (Chester County) – The Eureka Cotton Mill (29 acres), located prominently at one of the major entrances to the City of Chester, was a spinning facility constructed in the early 1900s. After being acquired as a distressed property, the owner demolished the mill, took the good heart pine flooring and recycled the metal. The County shut down operations when they caught him burying asbestos on site. The property has since been transferred to Paulette Birkner (see access letter). The site is overgrown, contains partially demolished buildings, and is a place of rampant criminal activity. The most shocking case was in December 2014, when a community leader was gunned down near the mill not a mile from his home. While no environmental assessment has been done, we know asbestos is present. We anticipate widespread PAH contamination from the burning of coal to power the mill, solvents used for degreasing and cleaning machinery, and chlorinated solvents from spot dry cleaning of fabrics. We also suspect PCBs from abandoned transformers. The property is adjacent to residential (front and back) and commercial properties. With the nearest resident only 30 ft. away from the mill, the site poses a safety and health hazard to the community. The property has rail access and utilities suitable for an industrial site. One developer has expressed interest in the site (letter provided), “if the environmental status of this property were to be defined.”



- **Jonesville Mill** (Union County) – Located in the Town of Jonesville, contamination at this demolished mill includes primarily PAHs from burning coal. The site holds standing water (a habitat for mosquitoes), and the town had a case of the West Nile Virus – a concern being managed by the DHEC. Views on potential reuse of the site vary from an amphitheater for community events to multi-family affordable housing. Grant funds for community visioning and assistance are definitely needed with cleanup planning.
- **Republic Mill #1** (Chester County) – The mill was built in 1910 in Great Falls. The plant was surrounded by a mill village (nearest current residence is 150 ft from the site), and the company operated a large company store that accepted company script and sold everything from sugar to coffins. The mills remained in operation as a major employer in Great Falls until 1979. Mill #1 (12.2-acres) burned and is now rubble. Contamination is most likely, common mill contaminants such as PAHs from burning coal, heavy metals from dyeing, solvents from degreasing and possible spot dry cleaning, and petroleum – but the chief concern is the “green hole”. In an October 30<sup>th</sup> community meeting residents said that workers dumped chemicals in the hole behind the plant including varsol. Several unmarked 55-gallon drums are said to remain on the property. The Great Falls Police Chief, Steven Rice, reported the police have responded to 200+ calls for nuisance and criminal activity since the mill was demolished. Brenda Fort, a Great Falls resident, noted that runoff from the site flows directly into the nearby Catawba River and cited vagrants, rats, and unwanted activities. The property is believed to be in bankruptcy with the mortgage being held by a bank in Milledgeville, GA. The Forfeited Land Commission refuses to take title for failure to pay back taxes and are fearful of environmental liability. The site needs a Phase 1 and likely an extensive Phase 2 Environmental Site Assessment (ESA) to investigate the “green hole”. Residents want the blight and dilapidated structures removed. The 2007 Great Falls *Community Master Plan* developed with input from business owners, residents and local leaders included the redevelopment of the Republic Mill as a top priority. The site is also located next to the proposed welcome center for a new State Park.
- **Buffalo Mill** (Union County) – Construction on the mill began in 1900 and eventually contained the main mill, office complex, power house, ice factory, warehouse, store and bank. The surrounding mill village consists of over 150 homes, a school and a baseball field – all adjacent to the brownfields site. Portions of the site are owned by Union County, but the remains of the main mill are in private ownership. A Phase 1 ESA identified numerous concerns: PCBs - transformer areas with a report of one exploding and hydraulic lifts; machine shop oil and solvents; weaving looms cleaned by spraying with solvents in courtyard; limited dyeing of fabric – heavy metals; drum storage areas and ASTs – petroleum and many possible contaminants in drums; asbestos; and lead paint. The property (9.6 acres) requires a Phase 2 ESA. Residents, living as close as 300 ft away, requested that Catawba COG seek funds for the cleanup of the site to help revitalize their rural community (the unincorporated Town of Buffalo). At the October 27 community meeting, one resident expressed concerns that runoff from the mill debris goes into the Buffalo Creek alongside the property. In addition, lights have been noted in the remaining building’s towers at night, and community members living near the property suspect criminal activity. Small children have been seen playing around the towers during the day, and residents fear they may fall into the hazardous tunnels that run below. In addition to these safety concerns, the site harbors rodents and other pests. The site is adjacent to HWY 215 – a blight on a key artery in Union County. The county is discussing site acquisition in order to clear away the hazardous structures using CDBG funding to pay for the nearly \$340,000 in demolition and abatement costs cited by contractors. Future redevelopment may include a community park. Access to the site for environmental assessments has been granted by the owner, Howard Johnson.

- **Kershaw Mill** (Lancaster County) – The Town of Kershaw is investigating the acquisition of the property (9 acres) for development. There is a known issue with asbestos on the property. DHEC shut down the demolition of the structures for lack of an asbestos survey. While the current owner of the site claims to have taken care of the asbestos in accordance with DHEC rules, the Town Manager doubts it was done properly. The community, with residents as close as 225 ft, wants to see the property cleared. Sixty-five members of the community, including many former mill workers, attended a public meeting at the Second Baptist Church in Kershaw on October 24. Residents cited leaking transformers and possible dumping of industrial-related waste products in the property's pond. There is also suspected asbestos contamination. One member, who lives 600 feet from the north side of the mill stated, "we need help getting this mess cleaned up," while another teared up over the desperation they were feeling about the situation. Residential properties made up from the former mill properties lie to the south and southwest of the site. The site is prominently located at the entrance to town, has good rail access, and desired redevelopment is for industrial or commercial reuse.
- **American Thread Mill** (York County) – Located on HWY 321, the property is a large tract of land (16 acres) in a prominent location on Main Street in the Town of Clover, surrounded by residential and commercial properties. Community representatives expressed a need to clean up the site, update legacy infrastructure, and revitalize the low-income neighborhoods of the former mill village that surround the mill (residences within 100 yds of site). Suspected contamination includes asbestos, lead based paint, PAHs, and heavy metals. Reuse of the property is expected to be a mixed use site. In the early 2010s, the community secured \$200,000 in Neighborhood Stabilization Funding (NSF) from HUD for debris removal. The property owner, Aaron Benfield has provided access (letter attached.)

Secondary priorities include the following mills: Bowling Green Spinning Mill (York County), Springsteen Mill (Chester County), Lancaster Mill (Lancaster County), Cannon Mill (York County), Coltex Mill (York County), Republic Mills 2 & 3 (Chester County), Lockhart Mill (Union County). Common mill contaminants expected at mill sites such as these are PAHs, solvents and chlorinated solvents, heavy metals, PCBs, petroleum, and asbestos and lead paint. These sites all have mill villages surrounding them.

#### **1.b. Welfare, Environmental, and Public Health Impacts**

##### *1.b.i. Welfare Impacts*

All of the small mill communities throughout the Target Area are struggling with the health and safety issues that are the unfortunate legacy of their industrial past. The descriptions of the high priority sites in the previous section detailed many of them. Blight from partially demolished and/or deteriorating mills is prevalent and affecting the neighboring communities. The vacant properties pose an ongoing safety risk due to neglected conditions of the buildings and grounds and the potential for fire, crime, and vagrancy. This year, there have been 35 reported violent crimes and 179 property crimes in an area of less than two miles from the Kershaw Mill. At the Great Falls Mill #1, the local police chief cites over 200 calls for nuisance and criminal complaints at the mill since the plant closed. Small children have been playing in the dangerous Buffalo Mill towers. At the Jonesville Mill site, standing water is a breeding ground for mosquitos, and a case of West Nile Virus has appeared in the community, stoking fears. Since 2006, three of the vacant mills in the region have burned. These fires placed additional financial pressure on strained local government budgets that are responsible for providing emergency services to fight fires, care for victims and prosecute perpetrators. Fire is a destructive threat to the mill houses often located in close proximity to the mills. These brownfield sites take a perpetual toil on the welfare of the Target Area, contributing to its decline.

##### *1.b.ii. Cumulative Environmental Issues*



The former mills are suspected or known to contain hazardous contamination such as asbestos, lead based paint, PAHs, VOCs, PCBs, and heavy metals, which are associated with their historical use. Some residents cited runoff into nearby creeks and waterways. In a geographic region roughly depicting the Target Area, the EJSCREEN mapper tool provided by the EPA shows the area includes higher levels of selected environmental indicators. The high presence of lead paint is in part due to the large number of former mill village homes. Low-income residents in these small houses are less likely to make home improvements due to a lack of financial resources – meaning old lead based paint remains in many of these old homes, exposing residents – particularly children – to the associated health risks.

#### Selected Environmental Indicators, EJSCREEN Report, 2016

Indicator	Target Area	State Average	EPA Region Average
Particulate Matter	9.43	9.39	8.90
Ozone	43.2	42.0	42.4
NATA* Air Toxics Cancer Risk	45	44	42
Lead Paint	0.27	0.15	0.16

\*National-Scale Air Toxics Assessment (NATA)

According to the Envirofacts tool, the four-county area of the Catawba COG has 271 facilities known to have produced and released air pollutants, 7 state superfund sites, 1 NPL site, 139 facilities that have reported toxic releases, 587 facilities reported to be hazardous waste generators, and 214 facilities permitted to discharge wastewater to local rivers. Data from [www.homefacts.com](http://www.homefacts.com) indicates that most zip codes in the Target Area register relatively high levels of environmental hazards as shown in the table below. All areas in the table were given a red warning indicator by HomeFacts.

#### HomeFacts Environmental Hazards Reporting, 2016

Residence	Brownfields	Registered Polluters	Superfunds	Tanks & Spills
CHESTER ZC 29706	2	17	4	37
GREAT FALLS ZC 29055	3	2	3	9
JONESVILLE ZC 29353	1	1	0	1
UNION ZC 29379	1	5	0	43
LANCASTER ZC 29720	2	9	5	88

#### 1.b.iii. Cumulative Public Health Impacts

##### Hospitalizations and Emergency Dept. Visits with a Primary Diagnosis of Asthma, Quarter 4 2015

Residence	In Patient #	In Patient Rate*	ER #	ER Rate*
<b>CHESTER COUNTY</b>	<b>28</b>	<b>86.78</b>	<b>204</b>	<b>632.22</b>
CHESTER ZC 29706	20	364.56	156	2843.60
GREAT FALLS ZC 29055	NA	NA	13	672.88
<b>YORK COUNTY</b>	<b>144</b>	<b>57.33</b>	<b>566</b>	<b>225.32</b>
CLOVER ZC 29710	13	226.32	23	400.42
<b>UNION COUNTY</b>	<b>53</b>	<b>190.81</b>	<b>160</b>	<b>576.02</b>
JONESVILLE ZC 29353	NA	NA	23	2662.04
UNION ZC 29379	36	447.48	116	1441.89
LOCKHART ZC 29364	NA	NA	5	1057.08
<b>LANCASTER COUNTY</b>	<b>41</b>	<b>47.76</b>	<b>252</b>	<b>293.56</b>
KERSHAW ZC 29067	7	341.13	44	2144.25
LANCASTER ZC 29720	27	301.47	197	2199.64

\*Rates per 100,000 population, SC Revenue & Fiscal Affairs, Health and Demographics Section; Nov 15, 2016

Public health is threatened by the brownfields located near residential and commercial districts, including low-income communities. Local representatives cite concerns of crime and vagrancy at these properties, and three have burned within the last decade. Smoke and particulate matter from fires pose a health risk to the community and are especially dangerous for sensitive populations like children, the elderly and people with chronic illness (e.g. asthmatics). Trespassing can expose

the community to risks from the known and suspected environmental contaminants, including asbestos-containing materials and contaminated dusts, which can also impact residents with asthma. The previous table compares hospital visits for asthma-related problems in zip codes with known brownfields properties to county-level incidents. The Zip Codes with brownfields all have higher incident rates for both in patient and emergency department visits, and in the majority of cases the disparity is more than double for brownfields-impacted communities.

SCDHEC's Central Cancer Registry (November 2016) shows that many communities impacted by brownfields also have a statistically significant heightened level of cancer incidents and/or morbidity from 2009 to 2013 including Chester (ZC 29706), Great Falls (ZC 29055), Clover (ZC 29710), Jonesville (ZC 29353) and Union (ZC 29353). Additionally, the 2016 County Health Rankings for South Carolina conducted by the University of Wisconsin's Population Health Institute ([www.countyhealthrankings.org](http://www.countyhealthrankings.org)) place Union and Chester counties (where many of Target Area Census Tracts are located) as some of the lowest in the state at 36 and 34, respectively, out of 46. A *Community Needs Assessment* performed by the Piedmont Medical Center in 2013 covering Chester, Lancaster and York Counties found the area's rate of cancer deaths exceeded the state average with Chester County having the highest rate of lung cancer among all counties in the state and ranking 6<sup>th</sup> in the state for all cancers. Cancer (#1) and heart disease (#2) were the top two causes of death in 2013 in all three counties. These higher rates of cancer may be due in part to the presence of carcinogenic hazardous substances, such as heavy metals (lead, chromium, etc.) PAHs, and petroleum constituents, such as benzene.

#### **1.c. Financial Need**

##### *1.c.i. Economic Conditions*

As an association funded by the member communities and without taxing authority, the Catawba COG does not have the financial resources to fund such wide scale brownfields assessment, cleanup, and redevelopment. Our agency provides project-specific assistance tied directly to grant-funded activities or contracts for our services. The majority of our annual budget, fully 88%, comes from these sources, and we do not have funding available to extend assistance for environmental assessments of brownfields. The Target Area comprises a region of particular need. Per capita income within the Target Area (\$12,226) is less than half that of the COG region as a whole (\$25,339). Cumulatively, the Catawba Region lost over 5,300 jobs from the closure of 26 textile mills between 1997 and 2009. In many cases, the smaller communities lost their primary employer when the mill closed. Financial resources in these areas are very limited, often limited to State allocations to local governments that are being continually reduces and some sales tax allocations. Mayor Ailene Ashe, who has been serving the Town of Lockhart for 20 years, works without pay. She says the tax base is so small, funding to advance the community comes solely through state and federal grants and assistance. In a statement representative of civic leaders in these small mill towns, "[I've] bloodied knees begging for help for Lockhart."

##### *1.c.ii. Economic Effects of Brownfields*

For decades, the mills in the Target Area were central to the life and welfare of residents. The plant provided stable jobs, while the company offered housing, utilities, banking and commercial services to the community. As those plants closed in the 1980s-2000s due to foreign competition and a changing economy, most of these communities failed to recover. With populations in decline, loss of a central employer and crippled with large blighted facilities, the small towns in the Target Area have been unable to mount effective economic development plans or recruit new, major employers to the area. Local communities report that these blighted properties incite crime and weaken local property values. Indeed, the median home value in the Target Area is only 60% of the region as a whole (2015 ACS US Census Bureau). The Eureka Mill once employed 2,000 workers with many living near the plant, but the facility closed in the late 1990s. Today, 40% of homes in adjacent residential areas are abandoned or condemned. The closure of 26 textile mills and loss of over 5,300 manufacturing jobs in the COG's area resulted in region-wide high

unemployment figures and a significant loss to the local tax base from reduced business and personal income taxes and sales tax revenues. This also led to migration of residents to other areas. From 2000 to 2010, the population in the Target Area declined 1%, while the state grew by more than 15% over the same period (US Census). The Target Area's unemployment rate is higher than the state, while home values and median income are both significantly lower. Furthermore, the presence of a major facility blighting residential communities and downtown commercial districts has hurt the efforts of economic developers to revitalize these communities. The City of Chester, for example, lost between 300-350 direct jobs, when the Eureka Mill was closed. Even today, the city notes that property values have been hurt by the facility and that there is "very little viable product available for commercial and industrial development." Local economic development officials regularly receive negative comments and concerns from prospective clients and site selection professionals, who are visiting their communities to vet them as suitable locations for new manufacturing plants. Many prospective investors are afraid to enter our more rural markets because of the negative impacts of these vacant mills.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **2.a. Project Description, Timing and Implementation**

#### *2.a.i. Project Description and Alignment with Revitalization Plans*

Despite the challenges these small communities face, residents of the Target Area remain committed to seeing their towns and cities revitalized. The Catawba COG has pulled together an alliance of county, city and citizen leaders dedicated to the redevelopment of the former mill properties. The Catawba COG is seeking \$500,000 for properties with potential hazardous substance contamination and \$100,000 for properties with potential petroleum contamination - \$600,000 in total – for our four-county region.<sup>1</sup> These funds will be used for community outreach, site characterization and redevelopment cleanup planning for selected brownfields properties. This project aligns with regional and local redevelopment planning. The Catawba COG's 2015 Comprehensive Economic Development Strategy lists as part of the region's top 8 needs: diversifying the region's manufacturing base in the former textile manufacture areas (i.e. Target Area), redeveloping abandoned former textile mills, and economically revitalizing local downtowns – all addressed by the proposed brownfields program. As another example, Chester County's 2008 *Economic Development Strategic Plan* proposed the redevelopment of vacant industrial buildings while the City of Chester's 2007 *Master Plan* featured the proposed redevelopment of the Springsteen Mill as key to city revitalization efforts. The Town of Clover's *Prioritized Community Needs* assessment completed in January 2017 identified, "Clearance of unsightly areas, including the dilapidated mill sites, such as the Coltex and American Thread Mill property," and "Undertake neighborhood studies in low to moderate income areas such as the American Thread Mill Village area," as key priorities.

The community in the Target Area has a high concentration of low-income minorities disproportionately impacted by the legacy of brownfields in our region. One in four live in poverty and one in three are minority. While only comprising 15% of our region's population, approximately 80% of our brownfields are estimated to reside in Target Area communities. To address the inherent social justice issues represented by these brownfield sites, the Catawba COG's brownfields program will reduce toxicity, illegal dumping, trespass, and blighted vacant parcels in these communities. Assessing sites is the first step to cleaning up these properties to help communities retain long-time residents and their families by building greener and healthier neighborhoods, mitigating negative environmental conditions through cleanup activities, provide access to new greenspace and recreational activities, and improving local employment opportunities at sites that can be reused by industrial or commercial enterprises. Overall, these

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<sup>1</sup> The City of Rock Hill is planning on submitting a separate community-wide brownfields assessment grant application; therefore, the City's jurisdiction is specifically excluded from our target area and this project.

activities will help make communities throughout the Target Area more attractive places to live, economically stronger, and healthier. Our communication strategy and recruitment of local community partners will ensure low-income minority residents are included throughout the program – building on our extensive CDBG meetings attended by 250+ community members in the Target Area.

#### *2.a.ii. Redevelopment Strategy*

The various mill communities in the Target Area have different issues and priorities for the redevelopment of their individual sites. Potential reuse ideas/strategies for each site are included in section 1.a.iii. However, there are consistent themes that underlay our redevelopment strategy for this project. [1] Our first priority is to address the environmental justice concerns related to the level of contamination and threat to human health and the environment represented by these former mill properties – particularly as they impact our vulnerable populations of children. We must protect the next generation of residents in these communities. [2] Our second priority is to remove blight and create greenspace. Many of these former mills have been demolished by scavengers or reduced to rubble by fire. Infrastructure reuse will be limited at these properties. Creating new greenspace enhances community wellness while creating more attractive areas that support the area's local economic development initiatives such as promoting nature-based tourism. Great Falls has a large community-wide campaign to revitalize itself with nature-based tourism, is working with state government to create a new state park, and also recently established a historic district. [3] Third, we will prioritize sites with strong grassroots support from the community. This will be gauged by the level of interest shown in community meetings, a documented history of coordinated action to address the problem (successful or not), and the completion of key redevelopment actions (i.e. contacting owners and securing site access, identifying interested developers, formalizing shared community visions for reuse and redevelopment, etc.). For example, while some progress has been made to address the environmental issues and blight at the Jonesville Mill and the Republic Mills properties, both initiatives have run aground after some initial progress because of a lack of financial resources. [4] Finally, we want to prioritize the potential for economic development through infrastructure reuse leading to new job creation. Selected properties in the Target Area with intact infrastructure present unique opportunities to stimulate the local economies. Cleaning up these sites will be important to securing the region's future. The large Eureka Mill, for example, has rail access and is located near I-77, making it a good location for industrial or warehouse operations.

In each case, the Catawba COG program via the Brownfields Task Force will balance the needs of the community with the anticipated benefits that can be realized given the limited amount of resources available for so many properties. By focusing on sites with a previous history of community involvement/progress and the potential for economic development, we hope to maximize the impact on the Target Area as a whole. In addition, these redevelopment activities will become models for other communities that have not yet made serious efforts to address their mill sites.

#### *2.a.iii. Timing and Implementation*

Mr. Robert Moody, Senior Planner with the Catawba COG, will oversee the implementation of the brownfields project. Mr. Moody successfully managed the COG's previous EPA brownfields grant as well as numerous other federal assistance programs. For this coalition project, representatives from all four counties, towns and cities are on the Catawba COG Board of Directors. These representatives will be actively involved in oversight of the project.

(a) Contractor Procurement: The Catawba COG will hire an environmental consultant to implement the environmental assessments and support outreach and planning. The COG will release a Request for Proposals (RFP) in accordance with 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500 for this contract and select a qualified contractor in a competitive process. This



process will be initiated immediately upon notification of the award by the COG so that the contractor will be ready to initiate grant activities as soon as funding is available.

(b) Site Inventory: Based on our recent outreach to communities in the Target Area, a preliminary inventory of high-priority brownfields properties throughout the four county region was developed. At the initial project team meeting, sites will be prioritized based on the following criteria (as described in 2.a.ii): 1) level of perceived contamination and threat to human health and environment; 2) potential for positive indirect economic development outcomes through blight removal and greenspace development; 3) level of community support and a demonstrated history of community action to address the brownfield property issues; and 4) potential for economic development, infrastructure reuse, and job creation. Sites will be ranked and prioritized based on community input, then the project team will provide the recommendations to the Board of Directors. The Board will review and approve these selections to ensure each coalition partner's priorities are addressed and that at least one assessment is completed in each coalition member's jurisdiction. The inventory and prioritization will be reviewed and updated quarterly.

(c) Site Access: The owners (in some cases our Coalition partners) for almost all of the sites identified in this proposal have already been contacted and indicated interest in participating. Access to the Buffalo Mill, Eureka Mill, Jonesville Mill, and American Thread properties has already been secured (see letters). The project team will work closely with other property owners and local stakeholders to secure access to high-priority sites and will explore legal options to access sites, where an owner cannot be identified or contacted.

## **2.b. Task Descriptions and Budget Table**

### **2.b.i. Task Descriptions**

**Task 1: Oversight:** The Catawba COG will track project tasks, schedule and budget; oversee the work of the selected brownfields contractor; and report on project activities and accomplishments to stakeholders. The project manager will also attend relevant meetings, workshops and conferences sponsored by EPA and/or SCDHEC. The anticipated level of effort required will be 300 hours of the project manager's time amounting to \$21,000 in personnel and the eligible fringe benefit costs (\$70/hour X 300 hours = \$21,000) and \$3,000 for travel to attend the training meetings and conferences, total \$24,000. An additional \$9,750 in indirect expenses incurred by the project will be paid by the COG as in-kind leverage. The work accomplished by the Project Manager will include 12 Quarterly Reports, three annual Disadvantage Business Enterprise Utilization reports, three Financial Status Reports, and updates in ACRES.

**Task 2: Community Involvement:** The Catawba COG will use multiple distribution channels for communicating with the Target Area communities about the grant project, including local and regional newspapers, radio announcements, fact sheets and brochures, social media and public meetings. In addition, the project team will establish a Brownfields Task Force with county government representatives, representatives from community partners, and citizen stakeholders from mill communities in the Target Area. The goal of these efforts will be to inform the public of the grant activities and the progress being made to accomplish project objectives, educate impacted areas on the nature of brownfields redevelopment, and invite participation in establishing redevelopment priorities. Total project budget for community involvement is \$63,000. These costs include \$35,000 in personnel and fringe benefit costs (\$70/hour X 500 hours = \$35,000), \$3,000 in travel expenses and \$25,000 for contractor support. An additional \$16,250 in indirect expenses incurred by the project will be paid by the COG as in-kind leverage. Specific subtasks include (not inclusive of indirect expenses):

1. Develop Outreach Materials (\$12,000) – Develop a series of press releases, a project fact sheet, PowerPoint presentation, posters, and a brochure for project outreach. Costs include associated printing expenses and the development of handouts, purchase of flipcharts and production of maps for the community meetings. [Contractor]

2. Author Community Involvement Plan (\$5,000) – Create a document that outlines all the requirements for the outreach efforts, the selected strategies for effective communication and recruitment, and a specific plan of action for implementation. [Contractor]
3. Hold Community Meetings (\$30,000) – Hold local community meetings at critical milestones during project implementation, including project kickoff, site selection and post-assessment reporting. [\$19,000 COG + \$3,000 travel / \$8,000 Contractor]
4. Brownfields Task Force Meetings (\$7,000) – The Brownfields Task Force will meet on a quarterly basis to review progress, provide QA
5. guidance to the project team and prioritize and recommend sites for assessment. [COG]
6. Distribute Project Information (\$9,000) – Set up and manage a COG webpage that provides critical project updates and distribute press releases and project event notices to media. [COG]

**Task 3: Environmental Site Assessments:** The selected Contractor will complete Phase I and Phase II ESAs at high priority sites. Site Eligibility Forms will be completed and approved by EPA prior to beginning the ESAs, and Petroleum Determinations will be made by DHEC. Phase I ESAs will be completed in accordance with ASTM 1527-13 and the EPA's All Appropriate Inquiries (AAI) Rule (70FR66070). We anticipate completing at least 18 Phase I ESAs at an average cost of \$3,500 (final cost depending on project size and complexity). Three of these are expected to be on sites with potential petroleum contamination (\$10,500) and 15 on sites with potential hazardous substance contamination (\$52,500). Phase II ESAs will be completed in accordance with ASTM 1903-11. Quality Assurance Project Plans (QAPPs) and Health & Safety Plans (HSPs) will be submitted to both the EPA and SCDHEC for review and approval prior to the start of Phase II ESA activity. We anticipate completing at least 8 Phase II ESAs with a cost of \$25,000 to \$75,000, inclusive of QAPP and HSP preparation, depending on the size of the property, the degree of contamination and the complexity of the assessment activities. It is anticipated that two of these Phase II ESAs will be conducted on properties with petroleum contamination at a total estimated cost of \$66,500 (at an average cost of \$33,250 per assessment). The remaining 6 Phase II ESAs are estimated to cost \$258,000 (at an average cost of \$43,000 per assessment). We also anticipate five Asbestos-Containing Materials (ACM) surveys to be completed at an average cost of \$2,500 for a total of \$12,500. Total ESA budget = \$400,000.

**Task 4: Cleanup Planning:** Cleanup planning will be conducted for high-priority sites following the completion of the appropriate environmental assessment activity. The selected Contractor will prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) for approximately 10 sites. Each ABCA will compare and contrast different methods of addressing the contamination found on the site. Costs, effectiveness, implementability, climate resiliency, and public input will be considered when evaluating the alternatives. ABCA development cost is estimated at \$7,500 per document (\$75,000 total project cost). Two of these sites are expected to have petroleum contamination (\$15,000 for petroleum/\$60,000 for hazardous). An additional \$38,000 is budgeted for COG staff to coordinate and implement community meetings and developer meetings to discuss cleanup options and remediation plans. This includes \$28,000 in labor for hazardous sites with \$2,000 in travel expenses, and \$7,000 for petroleum sites with \$1,000 in travel.

#### 2.b.ii. Budget Table

Budget Categories	HAZARDOUS					PETROLEUM*		
	Task 1 Oversight	Task 2 Outreach	Task 3 ESAs	Task 4 Planning	Total	Task 3 ESAs	Task 4 Planning	Total
Personnel	\$15,000	\$25,000		\$20,000	\$60,000		\$5,000	\$5,000
Fringe Ben.	\$6,000	\$10,000		\$8,000	\$24,000		\$2,000	\$2,000
Travel	\$3,000	\$3,000		\$2,000	\$8,000		\$1,000	\$1,000
Contractual		\$25,000	\$323,000	\$60,000	\$408,000	\$77,000	\$15,000	\$92,000
<b>Total</b>	<b>\$24,000</b>	<b>\$63,000</b>	<b>\$323,000</b>	<b>\$90,000</b>	<b>\$500,000</b>	<b>\$77,000</b>	<b>\$23,000</b>	<b>\$100,000</b>



\*Note: As oversight and outreach for the project cannot be discriminated between hazardous and petroleum contaminated sites, activities associated with these tasks are assigned to the hazardous portion of the budget. Only activities specifically associated petroleum-contaminated sites will be funded from the petroleum-specific budget.

## 2.c. Ability to Leverage

The Catawba COG is contributing \$42,250 to the project to cover our indirect charges. The COG will also leverage local, state and private-sector investment to clean up assessed properties. During our prior region-wide EPA grant project, Catawba COG invested \$75,000 to conduct environmental assessments and cleanup planning for the Union Mill brownfields site. The City of Union invested \$402,500 in a Voluntary Cleanup Contract (VCC), land acquisition and engineering services. An additional \$900,000 was leveraged from state CDBG funds for debris removal and remediation activities. A further \$350,000 was borrowed from the South Carolina Brownfields Cleanup Revolving Loan Fund. The Catawba COG had similar success at the Springsteen Mill in Chester. The COG spent \$65,000 in EPA funding for environmental assessments (which was subsequently repaid by the city), then leveraged \$500,000 in CDBG funding for demolition and debris removal. The City of Chester contributed \$62,500 and Chester County provided an additional \$62,500 for demolition and engineering services. Similarly, we intend to assist local governments with applying for additional CDBG funds for Great Falls Mill #1, Buffalo Mill and other promising sites after assessment and reuse planning efforts are completed and VCCs are in place. VCCs are a prerequisite for CDBG funding in SC, and these funds can only be used for above-ground activities—primarily demolition and debris removal.

Source	Purpose/Role	Amount	Status
COG Indirect Charges (Donated)	Associated with labor expenses for COG personnel supporting the project.	\$42,250	Secured
Volunteer Labor	7 BF Task Force Members committed to 4+ hours of work/month; 7 x 4 hrs x 36 months = 1008 hrs.	1008 hours	Secured
	3 BF Task Force Members did not commit specific times 3 x 4 hrs x 36 months = 432 hrs	432 hours	Expected
CDBG	Debris removal and property development tasks	\$340,000	Potential
SC BCRLF	Property cleanup planning and activities	\$200,000	Potential
HUD NSF	Debris removal	\$200,000	Potential

## 3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

### 3.a. Engaging the Community

#### 3.a.i. Community Involvement Plan

The Catawba COG ran a successful community involvement operation during its first EPA brownfields grant project – engaging representatives from communities and organizations across the region. In preparation for this grant, we held three community meetings at the end of October 2017 in churches very near key brownfields targets [Great Falls (18 attendees); Buffalo Mill (29 attendees); Kershaw (65 attendees)]. With this new initiative, we will build on both successes and lessons learned to extend our efforts and ensure the participation of local community representatives throughout the Target Area. First, the project team will broadcast project information through local and regional media, including appropriate radio and newspaper (i.e. *Chester News & Reporter*, The Herald Media Group, *The Lancaster News*, *The Kershaw News-Era*, *Fort Mill Times*, *Union County News*) coverage. This will be expanded through informal grassroots networks. For example, Reverend Ford, pastor of a local church in a neighborhood near one of the area's brownfields properties distributed meeting information in his bulletin and contacted other churches in the community to disseminate information on the brownfields-related community meeting held in his area in preparation for this application (Letter of Support attached). These information networks are especially effective in reaching the general public in the rural communities throughout the broad geographic region of the Target Area. The high level

of attendance at our recent CDBG meetings (250+ community members), where brownfields were discussed is evidence of our ability to engage with these rural neighborhoods. Second, the Catawba COG will hold a series of local and regional community meetings to discuss project objectives, activities and outcomes. This will include sending COG and contractor representatives to speak at local community, town hall and organizational meetings throughout the Target Area with an emphasis on the mill communities. The community meetings will be held at various locations throughout the region to ensure residents can attend a meeting close to where they live. Third, the Catawba COG will form the Brownfield Task Force. This Task Force will be comprised of government officials at the county and local level from across the region, representatives from community partners, and selected citizens, as appropriate. The Task Force will provide guidance to the project team, help engage the community, and prioritize and recommend sites for assessment.

### *3.a.ii. Community Progress*

The community will be kept abreast of the project activities through announcements made through print, radio and social media – including Facebook, Twitter, and related feeds of our community and government partners. Project team members will attend local community, town hall and organizational meetings throughout the Target Area to update residents and other stakeholders on project developments and outcomes. Information will be disseminated through the Task Force members to their various organizational bodies and social networks. In addition, the Catawba COG will develop and maintain an email directory of interested stakeholders who will receive summary quarterly updates on project activities timed with the project's reporting activity to the EPA. In many of these small, close-knit communities the most effective communication pathways are through local print media and the informal networks among stakeholder groups. The above communication plans appropriately leverage gatekeepers to these informal networks to ensure information reaches the local level. At the same time, information repositories such as our partners' social media platforms and the COG's website will ensure there is a public record of major milestones and accomplishments.

### **3.b. Partnerships with Government Agencies**

#### *3.b.i. Local/State/Tribal Environmental Authority*

**SCDHEC** is the agency responsible for the State brownfields and voluntary cleanup programs. SCDHEC will continue to assist with site eligibility determinations; the technical review of assessments, site-specific work plans, and cleanup plans (ABCAs); and development of brownfields VCC agreements with property owners.

#### *3.b.ii. Other Relevant Governmental Partnerships*

As the funding agency, the **Environmental Protection Agency (EPA)** will have significant involvement in the project. The COG will work with EPA Region 4's Project Officer to ensure all work is completed in accordance with the terms and conditions of the grant and that the Work Plan is met in a timely manner. **The Midlands Public Health Region** and the **Upstate Public Health Region** will provide core statistics and other relevant data as needed and support the efforts of the Brownfields Task Force in implementing the grant program (letters attached).

The Catawba COG has strong relationships with the local governments at the county and local level throughout the region. Representatives in all four counties are on the Catawba COG Board of Directors and will be actively involved in the oversight of the project by participation on the Brownfields Task Force. The Board will review and approve the final selection of sites for assessment activities. The following governments who have offered their facilities for meeting space and agreed to share project information via their websites, social media pages, and community bulletin boards: Chester County (Shane Stuart, Supervisor); Union County (Frank Hart, Supervisor); Lancaster County (Steve Willis, Administrator); York County (David Harmon, Assistant County Manager); City of Chester (George Caldwell, Mayor); Town of Kershaw (Mark

Dorman, Mayor); Town of Jonesville (Ernest Moore Jr., Mayor); Town of Great Falls (Lee Montgomery, Mayor) and, Town of Clover (Donnie Grice, Mayor) as well as many churches in the area.

In addition, the South Carolina Department of Commerce (SC DOC) will continue its support of the Catawba COG's brownfields project. We will leverage SC DOC incentives and funding to market former brownfields sites to prospective developers to bring jobs to the region. SC DOC manages the HUD Community Development Block Grants (CDBG) program for the state.

### **3.c. Partnerships with Community Organizations**

#### *3.c.i. Community Organization Description & Role*

- Katawba Valley Land Trust – This nonprofit owns the historic Company Store – built in 1910 and located adjacent to the Great Falls Mill #1 in downtown Great Falls and a partner in the creation of the new state park nearby. The organization seeks to expand the area's tourism industry and create jobs by leveraging and preserving its cultural and natural resources. A member will serve on the Brownfields Task Force.
- Great Falls Hometown Association – The Great Falls Hometown Association is a local nonprofit organization supporting the community of Great Falls. The organization's facility is located near the Republic Mill #1 site. Members include local residents and community leaders. The association has offered the project the use of the War Memorial Building in Great Falls as a space for community meetings.
- Ember Church – Concerned about the Eureka Mill property being a haven for criminal activity, a danger to the community, and a blight, this church is available for community meetings and will disseminate project information via its social media pages. The pastor will serve on the Brownfields Task Force.
- Clover Wesleyan Church – Located directly across the street from the American Thread Mill, this church recognizes the need for redeveloping this hazardous property. The church will offer its facilities as a meeting site, disseminate project information, and its pastor will serve on the Brownfields Task Force.
- Kershaw Second Baptist Church – Located across the street from the Kershaw Mill site, this church supports redevelopment and notes many of the problems they have had being located next to this dilapidated property. The church has offered its facilities as a meeting location and they will disseminate project information to their members.
- Buffalo Baptist Church – Calling Buffalo Mill an "immense burden" on their community, the church has offered its facilities as a meeting location and disseminating project information.
- Greater Clover Chamber of Commerce – This organization is concerned about the American Thread mill located on Main Street in Clover. The organization will disseminate project information through its website and Facebook page (1,425 followers).

Citizen members of the Brownfields Task Force will include Michael Williams, J. Keith Wright, David Sinclair, and Roger Dunn. Support letters were also sent from Great Falls by Brenda Fort and Larry Flin as well as GRASP, a nonprofit concerned about Great Falls #1.

*3.c.ii. Letters of Commitment* - Letters from each of the organizations are attached.

### **3.d. Partnerships with Workforce Development Programs**

There are no EPA Brownfields Job Training Grant Programs currently in the area. However, the COG will connect consultants, remediation contractors, and potential developers with SC Works Catawba, the local Workforce Development Board, facilitate local hiring.

## **4. PROJECT BENEFITS**

### **4.a. Welfare, Environmental, and Public Health Benefits**

The primary goal of this project is to revitalize the communities of the former mill towns in the Target Area by removing significant blight; creating new greenspaces and recreation-based tourism opportunities; and enticing new industry to relocate to the area to create jobs. These

efforts can help reverse the loss of Target Area population and create new economic drivers. In addition, demolishing the buildings and removing debris will remove a potential source of harm from illegal dumping, fire and trespass to improve public safety. Many of these properties have been vacant for more than a decade and several have been burned to rubble in fires. The Phase I and Phase II ESAs and asbestos surveys at these properties will clarify environmental concerns. Due to the historical use as textile manufacturing plants, these mills are likely to contain a variety of hazardous substances that may be contaminating the soil, groundwater and nearby waterways in the communities. Assessment is the first step to cleaning up these properties which will remove the potential contamination impacting nearby lower-income residential areas and sensitive populations while reducing the number of pollution sources in the region. Cleaning up the sites will also protect sensitive populations such as asthmatics, the elderly and children who may be impacted by these properties. These efforts may also help to reduce the rates of cancer by reducing the sources of and exposures to cancer-causing substances.

#### **4.b. Economic and Community Benefits**

Removing blight and potentially returning sites to productive industrial use will create jobs and strengthen the economic potential of these former mill communities. In most cases, these small towns and cities have suffered many years of population decline and economic hardship as a result of the closure of these facilities which once employed thousands of residents throughout the region. Removing blight, creating new greenspaces and enticing new industry into the area can revitalize these struggling communities. Increased employment will also strengthen the region's tax base, thus providing more funds to improve community services. Altogether, these efforts will help stem the tide of migration. These efforts will also preserve the authenticity of the old mill villages and help retain their historic relevance. The Eureka Mill site serves as a northern gateway into Chester from the nearby JA Cochran Bypass—Chester's primary commercial corridor. This site has viable development opportunities particularly along the Saluda Road frontage for neighborhood-based retail or logistics facility due to the excellent railroad access from both CSX and Norfolk Southern. Great Falls intends to revitalize its community through nature-based tourism tied to the redevelopment of the Great Falls Mill #1.

### **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

#### **5.a. Audit Findings**

Catawba COG is audited annually. The last audit was performed by McGregor & Company, LLP on June 30, 2016. The COG did NOT receive any adverse audit findings. The audit of the COG's 2017 fiscal year is currently in process and expected to be complete by December 31, 2017.

#### **5.b Programmatic Capability**

During its 40-year history, the Catawba COG has managed a wide range of federal and state grant programs, including over \$160 million in funding from organizations such as the EPA, US Department of Energy, US Department of Agriculture, HUD, SC DOC, SC Department of Transportation, and the Soil & Water Conservation Fund. Our 20+ member staff provide project management and financial oversight and our team has over 15 years of specific brownfields-related experience. The COG uses AccuFund accounting software to track expenses across project/grant programs. **Mr. Robert Moody**, Senior Planner, will oversee the brownfields project implementation. He successfully managed the previous EPA brownfields grant and numerous other federal assistance programs, including the rural transportation planning program with a \$5M annual budget. He has over 20 years of experience in local government planning, public engagement and community development with considerable work in brownfields redevelopment. Mr. Moody provides technical support to the BCRLF that the COG manages on behalf of SCDHEC. **Jason Vance**, a Regional Economic Development Planner, will serve as a backup project manager. Mr. Vance has 14 years of experience as a project manager meeting federal



requirements from CDBG and EDA grant programs. The Catawba COG will also hire an environmental consultant to implement the environmental assessments and support outreach and planning. The Catawba COG will release an RFP in accordance with 2 CFR 200 and 1500 for this contract and select a qualified contractor in a competitive process. The Catawba COG has the systems in place to hire or procure additional resources, if needed.

#### **5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes**

The project team will meet monthly by conference call to review project activities, accomplishments, schedule, and budget to ensure project goals are being met and take corrective actions, if necessary. The project team will track several performance measures to gauge success in the achieving the anticipated project outputs and outcomes. These include: number of participants in project community and task force meetings, size of stakeholder email directory, number of presentations delivered to local community groups and organizations, number of Phase I and Phase II ESAs completed, number of other assessments completed, number of ABCAs completed, acres ready for reuse, amount of leveraged funding, number of communities directly assisted by grant activities, number of communities not directly assisted by grant activities that demonstrate new or renewed interest in brownfields redevelopment. Metrics will be included in the quarterly reports and property specific information will be entered into ACRES.

#### **5.d. Past Performance and Accomplishments**

##### *5.d.i. Prior EPA Brownfields Assistance Grants*

The Catawba COG has received two prior EPA Brownfields Assistance Grants: 1) a \$200,000 Brownfields Pilot Assessment grant in 2002 for a regional brownfields program covering our four-county region (completed November 2005); and 2) a \$200,000 Brownfields Assessment grant in 2006 for the Old Town area of the City of Rock Hill (completed December 2009). Due to the high number of former mill properties that remain in the Target Area and the financial constraints of the impacted communities, additional funding is needed to further the address the brownfields properties in the region. In addition, the communities in the Target Area have not had access to EPA brownfields assistance through the COG in over a decade, as the second project was focused exclusively in a targeted region in the City of Rock Hill (not part of this application).

##### *5.d.i.1. Accomplishments*

- Developed a brownfields inventory that included 16 textile-related mill sites.
- Conducted 16 Phase I and 5 Phase II site assessments.
- The City of Rock Hill secured \$5.9 million in brownfields cleanup funding from SC BCRLF.
- The City of Union completed brownfields cleanup activities for a mill property under a SC DHEC VCP disbursement with technical assistance from the COG and funded by a \$500,000 CDBG award and a \$370,000 SC BCRLF disbursement, resulting in 40 apartment units and total private investment of over \$5 million.
- Worked with a Chester community group to convert a former textile mill into a park.
- The Gayle Mill site was turned into a community park with funding from Chester County Parks, Recreation and Tourism, Springs Industries, and Springs Close Foundation.
- First project named 2003 “Project of the Year” by the SC Association of Regional Councils.

The outputs and outcomes for both projects were accurately reflected in the reports submitted to EPA. ACRES did not exist yet.

##### *5.d.i.2. Compliance with Grant Requirements*

Both projects were compliant with all work plan and schedule requirements as well as all terms and conditions. The expected results were achieved and both projects expended 98% of the funding. Small balances remained at the end in order to ensure the projects did not run over budget. In addition, the COG complied with all reporting requirements, including the submission of quarterly reports, financial status reports, grant deliverables, and the property profile forms.

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☒ Preapplication  
☐ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

### State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

Catawba Regional Council of Governments

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

57-0534143

\* c. Organizational DUNS:

1057957020000

### d. Address:

\* Street1:

215 Hampton St.

Street2:

Suite 200

\* City:

Rock Hill

County/Parish:

\* State:

SC: South Carolina

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

297300000

### e. Organizational Unit:

Department Name:

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

\* First Name:

Robert

Middle Name:

\* Last Name:

Moody

Suffix:

Title:

Senior Planner

Organizational Affiliation:

\* Telephone Number:

803-327-9041

Fax Number:

\* Email:

rmoody@catawbacog.org



## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

E: Regional Organization

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

\* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Catawba Regional COG Coalition Assessment Project for the counties of York, Chester, Union, and Lancaster, South Carolina

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="600,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="600,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: